

NRL RCRA PERMIT FACT SHEET #1

DEPARTMENT OF HEALTH

825 N. CAPITOL STREET, NE, WASHINGTON, DC 20002

ENVIRONMENTAL HEALTH ADMINISTRATION
BUREAU OF HAZARDOUS MATERIAL & TOXIC SUBSTANCES
HAZARDOUS WASTE DIVISION
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This fact sheet describes the hazardous waste storage permit issued to the US Naval Research Laboratory (NRL). The Hazardous Waste Division (HWD) issued this permit outlining specific conditions for the continued storage of hazardous waste at NRL. This information is provided in accordance with regulations at 20 DCMR §§4702.3 and 4702.4.

NRL is the primary general-purpose research facility for the U.S. Navy. NRL is located at 4555 Overlook Avenue, SW, in Ward 8 (ANC 8B) Washington, DC. NRL conducts a broad-based, multidisciplinary program of scientific research and advanced technological development directed toward new and improved materials, equipment, and techniques, systems and related operations for the U.S. Navy and Marine Corps. The activities include basic and long-range research, exploratory and advanced technology development, development of prototype systems, scientific research for other Naval Commands, and engineering tests and evaluation services.

Hazardous wastes produced at the NRL are generated as a result of a number of widely different and complex operations. Therefore, the amounts and types of wastes generated vary accordingly. The overall chemical composition and types of hazardous wastes generated at NRL will vary from experiment-to-experiment and year-to-year, depending on the nature and longevity of the research being conducted. Quantities of wastes generated at NRL are typically small, varying from a few grams to tens of gallons and may be in solid, liquid, or gaseous states.

The most common hazardous wastes generated at the NRL are various organic solvents, chlorinated and non-chlorinated, used mainly for extractions, and equipment cleaning. In addition to the solvents, unneeded chemical reagents, by-products, and end products from diverse small-scale experiments, account for the bulk of the wastes generated at the site. These wastes are typically kept in the original reagent containers or small bottles, bags, and cans. Wastes are also generated from facility maintenance activities. These wastes are typically kept in 5-gallon or smaller quantities, however 30 or 55-gallon drums are occasionally used.

A substantial portion of wastes generated at NRL are shipped off-site within authorized time limits and do not require extended storage. Identifying and securing appropriate off-site disposal for such a wide variety of chemicals frequently requires additional time, therefore NRL seeks a permit under federal and District law to store wastes until proper disposal can be assured.

The US Environmental Protection Agency (EPA) granted NRL an "interim status" permit to store hazardous waste in 1982. A final storage permit (No. DCS00100) was issued jointly by EPA and the District Government, effective June 1, 1986. The current permit application, that is the subject of this action, was submitted by NRL to meet the regulatory requirements concerning the expiring 1986 permit.

Waste management controls include design, operations and maintenance of buildings and safety equipment and are strictly regulated by the permit. Regulations published at 20 DCMR Chapter 44 identify standards that must be met and maintained for storage of hazardous waste to be allowed in the District. Copies of the permit application and permit may be viewed at the DC Dept of Health, Environmental Health Administration, Hazardous Waste Division, 51 N Street, NE, 3d Floor, Washington, DC 20002.

PROCEDURES FOR REACHING A FINAL DECISION

The purpose of the permitting process is to afford the DC Department of Health (DOH), interested citizens, and other governmental agencies the opportunity to evaluate the ability of a permit applicant to comply with the applicable hazardous waste management requirements and standards promulgated under the D.C. Hazardous Waste Management Act (HWMA). The DOH was required to prepare a draft permit that set forth all the applicable requirements the applicant would be required to meet during the duration of the permit. The public was provided forty-five days to review the application and comment on the draft permit conditions before final action was taken to issue the hazardous waste management permit. [DC APA and 20 DCMR 4703.2(a)]

The comment period began upon publication of a Notice in the D.C. Register. The NOTICE OF HAZARDOUS WASTE STORAGE FACILITY DRAFT PERMIT was published in the D.C. Register on Friday, July 25, 2003. Accordingly, the comment period ended on Monday, September 8, 2003. If a public hearing was found necessary to clarify any issue regarding the permit decision, DOH would have set a date. Public notice of public hearings is required at least 30 days before the hearing. A public hearing was not requested nor determined necessary on the NRL Permit.

DOH was required to consider all written comments received during the comment period pursuant to the requirements of the hazardous waste regulations of 20 DCMR Chapters 40 through 54, and DOH permitting policies, when making a determination regarding the issuance of a hazardous waste permit.

POST PERMIT CONSIDERATIONS

Once issued, permits are subject to permit actions, such as modification, suspension, and/or revocation. When a permit is to be modified, a draft permit is prepared incorporating the modification. The permit is presented for public comment, as described above, except that the comments are limited to the modification. A permit can be suspended or revoked for noncompliance with the laws or regulations, misrepresentation of facts, or a threat to human health or the environment.

Two elements of the permit are to be conducted after the issuance date: (1) NRL has been classified by USEPA as a medium priority facility for which a Corrective Action (CA) element must be completed. The CA must demonstrate that the facility is in compliance with designated environmental indicators for (a) human health exposures under control and (b) potential contaminated groundwater under control. The 2nd post issuance element is the development and implementation of a waste minimization/pollution prevention plan.

Additional information may be obtained from DCDOH Hazardous Waste Division Contact: Mr. Nick Kauffman at (202) 535-2305 or visit the DCDOH website at: www.dchealth.dc.gov - select Environmental Health, then Hazardous Waste Division.